

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BARBARA CASERO, As Personal
Representative of the Estate of
YLDELISA CALVO DORNHECKER; BARBARA
CASERO, Individually; MARIO CALVO,
Individually; and, YLDELISA CALVO,
Individually,

Plaintiffs
vs.

CIVIL ACTION NO.:04-221-GMS

JOSEPH V. LAMBERT, Individually;
and CAR RENTALS, INC.

PLAINTIFFS' RULE 26(A)(1) INITIAL DISCLOSURES

Plaintiffs, BARBARA CASERO as Personal Representative of the Estate of YLDELISA CALVO DORNHECKER, BARBARA CASERO, MARIO CALVO, and YLDELISA CALVO, by and through counsel, hereby submit their Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) as follows:

A. Name and if known, the address and telephone number of each person likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subject of the unless solely for impeachment, identifying the subject of the information:

To the extent known at this time to Plaintiffs, the following persons and firms may have knowledge of discoverable information:

1. BARBARA CASERO, MARIO CALVO, and YLDELISA CALVO, Plaintiffs; they have knowledge concerning their relationship with the deceased, the funeral and burial expenses, and their financial relationship.
2. MIKEL DORNHECKER: As the driver of the vehicle in which THE deceased was traveling, he has knowledge concerning the motor vehicle accident. His address is unknown.
3. Joseph V. Lambert, 75 Aspen Drive, Basking Ridge, NJ 07920: As the party charged with causing the accident he has knowledge of the motor vehicle accident.
4. Representatives of New Jersey Manufacturers Insurance Company 301 Sullivan Way, West Trenton, NJ 08628;

5. Representatives of the Delaware State Police, Troop 3;

6. All witnesses listed in all the investigative reports produced in the reporting and investigation of the accident.

7. All certified court disposition forms for the charges made for causing the accident.

8. The troopers: These witnesses have knowledge of the motor vehicle accident subject of this lawsuit.

9. The fire fighters: These witnesses have knowledge of the physical condition of the Plaintiff at the scene of the accident.

10. Tax preparers records Custodian: These witnesses have knowledge of the deceased yearly earnings.

11. Plaintiffs counsel.

B. Copy of or description by category and location of all documents, data compilations and intangible things that are in the possession, custody and/or control of the party and that the disclosure party may use to support his claims or defenses, unless solely for impeachment:

1. Copies of traffic report for subject incident.

2. Copies of other fatality reports for the subject incident.

3. Copies of photographs and family gatherings.

4. Photographs of the family with the deceased.

5. Bills for funeral and burial expenses

6. Police Reports and fatality investigation reports.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying under rule 34, documents or other evidentiary material not privileged or protected from disclosure on which such computation is based including materials bearing on the nature and extent of injury suffered:

1. Funeral and burial expenses.

2. Estimates, expenses and contributions made in past and for future years by the deceased to her mother, her father and her sister. These documents are in the process of being gathered and

readied for production by Plaintiffs.

D. The Existence of Any Insurance Agreement Under which any person or Entity carrying on an Insurance Business may be Liable to Satisfy Part or all of the Judgment that may be Entered in this case.

1. New Jersey Manufacturers; liability insurance; Policy No. F651797-3; Policy limit: \$500,000.

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